

SEYFARTH SHAW LLP

Francis J. Ortman III (SBN 213202); fortman@seyfarth.com

Aryeh M. Hersher (SBN 260321); ahersher@seyfarth.com

Jason M. Allen (SBN 284432); jmallen@seyfarth.com

Michael A. Wahlander (SBN 260781); mwahlander@seyfarth.com

James E. Barolo (SBN 301267); jbarolo@seyfarth.com

560 Mission Street, 31st Floor, San Francisco, California 94105

Telephone: (415) 397-2823 / Facsimile: (415) 397-8549

Attorneys for Plaintiff

RAYMOND J. MANZANILLO

MCNAMARA LAW FIRM

Peter Jon Hirsig (SBN 197993); Peter.hirsig@mcnamaralaw.com

William Lee McCaslin (SBN 249976); William.McCaslin@McNamaraLaw.com

639 Kentucky Street, First Floor, Fairfield, CA 94533

Telephone: (707) 427-3998 / Facsimile: (707) 427-0268

Attorneys for Defendant

N. BROWN

KAMALA D. HARRIS

Attorney General of California

MARISA Y. KIRSCHENBAUER

Supervising Deputy Attorney General

Michael James Quinn (SBN 209542); Michael.Quinn@doj.ca.gov

California State Attorney General's Office

455 Golden Gate Avenue, Suite 11000,

San Francisco, CA 94102-7004

Telephone: (415) 703-5726 / Facsimile: (415) 703-5843

Attorneys for Defendants

GREGORY D. LEWIS; J. HALLOCK; K. MCGUYER; MATTHEW CATE AND  
T.A. WOOD

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RAYMOND J. MANZANILLO,

Plaintiff,

v.

GREGORY D. LEWIS, et al.,

Defendants.

Case No. 3:12-cv-05983-JST

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO DEPOSE PRISONER GEORGE  
BLAKELEY**

STIPULATION AND ~~PROPOSED~~ ORDER TO DEPOSE PRISONER GEORGE BLAKELEY

CASE NO. 3:12-CV-05983-JST

1 Plaintiff Raymond Manzanillo ("Plaintiff") and Defendants N. Brown, Gregory D. Lewis, J.  
 2 Hallock, K. McGuyer, Matthew Cate, and T.A. Wood ("Defendants") (collectively the "Parties") by and  
 3 through their counsel hereby stipulate and jointly request the Court order Prisoner George Blakeley to be  
 4 deposed pursuant to Federal Rule of Civil Procedure 30(a)(2)(B).

5 On August 8, 2011 George Blakeley attacked Plaintiff in the SHU of the Pelican Bay State  
 6 Prison. The incident between George Blakeley and Plaintiff on August 8, 2011 forms the crux of  
 7 Plaintiff's claims in this case. It is therefore necessary that Plaintiff have the opportunity to depose  
 8 George Blakeley. The Parties have agreed that the deposition will take place at Folsom State Prison on  
 9 Monday, July 11, 2016 commencing at 10:00 AM. Attached as Exhibit A is a copy of the draft  
 10 subpoena and notice of deposition for Mr. Blakeley.

11 Federal Rule of Civil Procedure 30(a)(2)(B) requires leave of court for any deponent who is  
 12 confined in prison. As such, the parties respectfully request the Court to grant Plaintiff leave to depose  
 13 George Blakeley. A draft deposition subpoena is attached herein.

14 **IT IS SO STIPULATED.**

15 DATED: June 27, 2016

Respectfully submitted,

SEYFARTH SHAW LLP

18 By: /s/ James E. Barolo

Francis J. Ortman III  
 Aryeh M. Hersher  
 Jason M. Allen  
 Michael A. Wahlander  
 James E. Barolo

22 Attorneys for Plaintiff  
 RAYMOND J. MANZANILLO

1 DATED: June 27, 2016

Respectfully submitted,

2 MCNAMARA LAW FIRM

3  
4 By: /s/ William Lee McCaslin

5 Peter Jon Hirsig  
William Lee McCaslin

6 Attorneys for Defendant  
7 N. BROWN

8 DATED: June 27, 2016

Respectfully submitted,

9 CALIFORNIA STATE ATTORNEY  
10 GENERAL'S OFFICE

11  
12 By: /s/ Michael James Quinn

Michael James Quinn

13 Attorneys for Defendants  
14 GREGORY D. LEWIS; J. HALLOCK;  
15 K. MCGUYER; MATTHEW CATE AND  
16 T.A. WOOD

17 **ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

18 I, James E. Barolo, attest that concurrence in the filing of this stipulation has been obtained from  
19 the signatories, William Lee McCaslin and Michael James Quinn, counsel for Defendants.

20 Executed this 27th day of June 2016, in San Francisco, CA.

21 /s/ James E. Barolo

22 James E. Barolo

**~~PROPOSED~~ ORDER**

Pursuant to the Parties' stipulation and good cause appearing,

IT IS SO ORDERED.

Dated: June 28, 2016

